



Control Number: 38470



Item Number: 14

Addendum StartPage: 0

PUC PROJECT NO. 38470

**CONFIDENTIALITY OF ELECTRIC
GENERATION INFORMATION IN THE
ELECTRIC RELIABILITY COUNCIL
OF TEXAS**

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**PUBLIC UTILITY COMMISSION
OF TEXAS**

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COMMENTS OF THE LOWER COLORADO RIVER AUTHORITY

The Lower Colorado River Authority (LCRA) appreciates the opportunity to file comments in Project No. 38470, Confidentiality of Electric Generation Information in the Electric Reliability Council of Texas. LCRA has opposed the approval of the associated Nodal Protocol Revision Request (NPRR) 209 in the stakeholder process at the Electric Reliability Council of Texas (ERCOT).

LCRA recognizes that a small subset of transmission line flows and transformer flows posted hourly as part of State Estimator (SE) report may be used to calculate resource output. Substantive Rule 25.505 requires the posting of resource output 60 days after the operating day but is silent on posting of data that may be used to calculate resource output. To that end, LCRA has supported the maximum transparency afforded by the implementation of the nodal market. The data included in NPRR209, and also in the proposed rule includes a delay in the release of certain data that is currently available in real-time in the zonal market. LCRA continues to support having tap positions and voltages as well as flows that cannot be used to calculate resource-specific output available in the real time. While LCRA has actively supported more rapid release of State Estimator data, the 14 days being proposed in the published rule is a reasonable compromise and will meet the needs of the market. With the publication of this rule, the changes to ERCOT Protocols proposed in NPRR209 are clearly not needed.

14

Zonal Market	Nodal Protocols	PUCT Staff Concern in NPRR209	NPRR209
Flows on CSCs and CREs posted by ERCOT in real-time	Flows on all lines and transformers posted by ERCOT hourly	Small subset of these flows may conflict with SR25.505	NO Flow posted by ERCOT for 60 days
Voltages not treated as Protected Info	Voltages posted by ERCOT hourly	No concern specified	NO Voltage posted by ERCOT for 60 days
Tap Positions not treated as Protected Info	Tap Positions posted by ERCOT hourly	No concern specified	NO Tap Position posted by ERCOT for 60 days

LCRA supports the release of the SE data because much of the SE information is available commercially through vendors such as GenScape. Because some of the information is commercially available, it should not be considered Protected Information.

- Posting State Estimator Reports is important for:
 - Transparency into ERCOT operation of the grid (e.g. understanding wind curtailments, reasons behind dispatch and prices)
 - Transparency into system conditions (e.g., forced transmission outages, distance from line, voltage, and contingency limits)
 - Transparency into LMP deviations and the expected duration of such deviations based on cause that can be derived from SE reports
 - Real-time optimal Ancillary Service responsibility re-allocation
 - Better day-ahead forecasting based on current day SE reports – this enables better fuel consumption forecasts thereby reducing fuel costs for the entire market

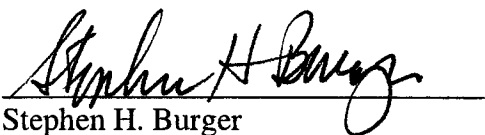
LCRA prefers a two-day lag between posting of the SE flows that can be used to calculate resource output and real-time. While nodal prices can be indicative of resource outages, delaying the SE data by two days would insulate entities that find themselves in a vulnerable position in the market. LCRA is willing to compromise to the 14-day release time frame but still

prefers the real-time release of voltages and tap positions and flows that cannot be used to calculated resource-specific output.

LCRA's suggested changes to the language of the proposed rule are as follows:

(E) Notwithstanding the provisions of paragraph (3)(B) of this subsection, beginning 14 days after the start of operation of the market under a nodal market design, the full State Estimator Report for each hour shall be posted 14 days after the day for which the data was accumulated. The State Estimator Report shall include, but not be limited to, transmission flows and voltages and transformer flows, voltages, and tap positions. Beginning with the start of operation of the market under a nodal market design or as soon as practicable, the State Estimator Report excluding transmission flows and transformer flows from which resource-specific output levels can be arithmetically calculated ("Redacted State Estimator Report") shall be posted at the end of each hour for the results of that hour. In the event that the systems are unable to post each hour any or all of the elements of the Redacted State Estimator Report and until the systems are capable of posting each hour those elements of the Redacted State Estimator Report, those elements shall not be posted with the Redacted State Estimator Report each hour.

Respectfully submitted,


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